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Robert H. Jackson
Executive Director-
Federal Regulatory

August 13, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

AUG 28 1997

Ms. Renee Alexander
Network Services Division
Common Carrier Bureau
Federal Communications Commission
2000 M Street, N.W.
Room 230
Washington, D.C. 20554

Re: CC Docket No. 98-96. Central Office ("CO") Code Opening" Fees

Dear Ms. Alexander:

On July 31, 1997, the Network Services Division asked U S WEST Communications ("USWC") several questions concerning "code opening" fees. We were asked to "[d]efine and distinguish the terms 'assignment of CO codes,' 'activation of CO codes,' and 'CO code opening.'" The questions also seek information concerning the functions associated with each of these terms and the fees charged for those activities. Following are USWC's answers to those questions.

From the USWC perspective, we see assignment of CO codes having two major components: assignment of a code and notification of a code. They are addressed separately in our answer. Similarly, we see CO code activation and opening as related activities; they are discussed as one subject.

Assignment & Notification of CO Codes

Assignment of CO codes includes the following functions (also refer to section 5.0 of the CO Code Assignment Guidelines, April 1997):

- Receive and analyze the code request from a carrier;
- Code analysis -- involves analyzing area of request for conflicts, previous assignment, etc.;
- Code assignment (select the code to be assigned and assign it to a carrier);
- Return the code assignment (confirmation) to the requester;
- Forward the assignment to the code notification process (see below); and
- Periodic follow-up for code activation completion.

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Notification of CO codes includes the following functions:

- Receive notice of the code assignment;
- Verify accuracy of service provider data;
- Input data into the Bellcore "notification databases" (i.e., RDBS and BRIDS);
- If the carrier receiving the new code is a NECA company, input data into the NECA database;
- As needed, activate the "emergency code notification process"; and
- Resolve "activation" issues after notification process.

Notification in the Local Exchange Routing Guide ("LERG") does not automatically imply code opening or activation. Industry participants occasionally assume that if a new code is published in the Bellcore LERG, that code activation / opening is automatic. This is not the case. True code activation or opening is dependent on having interconnection arrangements and translations work completed, i.e., trunks in place that interconnect the companies in order to truly activate and process calls using the new CO codes.

Activation & Opening of CO Codes

Activation and opening of CO codes include the following functions:

- The USWC complex translations group receives the new code notice;
- The code is activated by performing translations in all end offices and tandems in the USWC network region-side;
- Other service providers (e.g., IXCs, CLECs, Wireless) have similar code activation functions (The new code must be opened in all other carriers' switches);
- Customer Premise Equipment ("CPE") owners, e.g., PBX; must activate the new code; and
- Customer Owned Coin Operated Telephone ("COCOT") open codes in the CPE to process outgoing calls from CPE equipment to the network.

USWC does not charge any carrier a fee in connection with CO code assignment or notification activities. CO code activation and opening activities are required of all carriers (and others) whenever a new code is added. Each party bears its own costs. No cash transfers are made between parties.

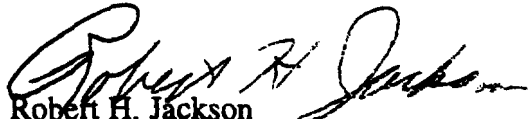
USWC is quite concerned about the current numbering situation under which we continue to act a CO code administrator. Not only are we uncomfortable acting as administrator in an increasingly competitive market, but we are also dismayed at being required to subsidize other carriers through our bearing the costs of CO code assignment and notification. With the increased level of CO code assignments in the last few years, the

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level of subsidy is increasing.¹ The current situation is not appropriate in a competitive market. USWC remains concerned with the failure of the Commission to select a new administrator for the North American Numbering Plan ("NANP"). As the Commission is well aware, the clock can not begin to run for the transfer of the CO code administration function until the new NANP administrator begins operations. USWC has in the past volunteered to be the first ILEC to transfer its CO code administration functions to the new administrator. We again offer our assistance and volunteer to be the trial for transferring the CO code administration and urge the Commission to act immediately to name the new administrator for the NANP.

I hope this addresses your questions fully. If you have any other questions, please contact me at 202-429-3123.

Sincerely,


Robert H. Jackson
Executive Director

cc: Kathleen Levitz
Geraldine Matise

¹In addition to these direct number administration costs, USWC also incurs other costs associated with our function as CO code administrator in fourteen states. The CO code administrator must monitor the code utilization/NPA planning functions that go along with assignment, coordinate industry meetings for NPA relief planning, participate in public hearings on NPA relief plans, present industry recommendations to State Commissions for NPA relief, notify NANPA of NPA relief plans, coordinate implementation of new NPAs with the industry. These additional costs also add to an inappropriate subsidy in an increasingly competitive market.